



Independent Evaluation of IOM Project:

**“Reinforce Capacities to Implement
the Counter-Trafficking Legislation
in Tunisia - Share II phase two.”**

Final Evaluation Report

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EXECUTIVE SUMMARY

Tunisia is a source, destination and transit country for trafficking in persons (TIP). As a source country, IOM and other organizations have collected information on Tunisians seeking economic opportunities who have been trafficked through false promises of well-paid jobs abroad, including to European, Middle Eastern and other African countries.

Tunisia is also a trafficking destination and transit country. After the 2011 Libyan crisis, hundreds of thousands of migrants and refugees/asylum seekers fled across the southern border of Tunisia. Recently, hundreds of sub-Saharan women, mainly from Côte d'Ivoire, have been identified and assisted as victims of trafficking for domestic servitude in private homes in Tunis, Sfax, Sousse, and Gabes. Based on IOM Tunisia's statistics, between 2012 and February 2019, 85% of victims detected and assisted by IOM Tunisia were from this particular country.

Alongside transnational trafficking, internal trafficking represents a risk in Tunisia, especially for children in the informal work sector or forced to beg in the streets, as well as girls subject to domestic servitude. There is however limited data currently available on internal trafficking of both adults and children. According to multiple stakeholders, at present this dimension is largely under-stated and un-addressed.

The first Share project (Share I) was implemented from 2011 to 2013 with funding from the US J/TIP. The project was exploratory in nature and aimed to assess the extent, nature, forms and scale of trafficking in persons in the country. The project found that that Government response to counter-trafficking was weak and overall highlighted a limited understanding and knowledge of the concept of human trafficking among both Government institutions and the general population.

The second Share project, entitled "Reinforce capacities to identify and provide adequate assistance to victims of trafficking in Tunisia (Share II phase one)", also funded by the US J/TIP, was launched in 2014 with an initial duration of 36 months and a budget of 700,000 USD. At the onset of the second Share project, Tunisia had yet to pass anti-trafficking legislation. Evaluation respondents frequently highlighted that trafficking in persons (TIP) knowledge within the general public and Government institutions - particularly the criminal justice system was limited, leading to a failure to identify victims of trafficking and to provide appropriate care to victims in accordance to their internationally recognized protection rights. The original objectives and activities of the second Share project were thus designed to respond to these needs.

In agreement with the donor, the project duration was extended through a cost-extension until 30 September 2018, and the title changed to "Reinforce Capacities to Implement the Counter-Trafficking Legislation in Tunisia" to reflect the enactment of the Law n°2016-61 on the prevention and fight trafficking in persons in Tunisia and the establishment of the National Commission for the Fight against Trafficking in Persons in 2017. To ensure continuity of activities between Share II and the planned Share III project, which has already received informal funding approval from the donor and, if confirmed, it is due to start in April 2019, the second phase of Share II phase was further extended through a no cost-extension until 28 February 2019. The cost-extension phase of the Share II project has an overall budget of 250,000 USD.

In accordance with the IOM and US J/TIP Agreement S-SJTIP-14-GR-1009, the Share II phase two project supported an evaluation to "assess to what extent the project has contributed to its overall objective and achieved its results, and to evaluate if the project's approach (design and implementation) was the right strategy. The evaluation also sought to identify lessons

learned to generate evidence-based knowledge that could be useful to IOM, the Government of Tunisia and the donor to expand and/or replicate such kind of project.

Using the OECD Development Assistance Committee (DAC) Criteria to structure the evaluation, the evaluators developed a set of research questions to guide the assessment of the project, drawing on the draft list of evaluation questions provided in the Terms of Reference as a starting point. The evaluators used these research questions to develop an evaluation matrix, which served as the basis for developing and tailoring interview guides for the primary stakeholder groups. Data was collected through desk review of key project documentation and direct interviews with key stakeholders in Tunis, Tunisia. The data was analysed and examined relationally to inform the development of the evaluation findings and recommendations and the overall drafting of this evaluation report.

The evaluation faced some limitations. There was limited availability of quantitative baseline and end-line data to assess achievement of all key performance indicators. The limited availability of end-line data was also due to the fact that the evaluation took place prior to the conclusion of the current phase on 28 February 2019. Further, while data exists with regard to number of training events, number of participants, number of meetings, workshops etc., very little information is available on the outcomes of these activities. As a result, the evaluation relies heavily on qualitative data provided by stakeholder feedback.

The evaluator did not meet any of the victims of trafficking assisted under the project. This decision was made by the evaluation team taking into account protection and sensitivity concerns, particularly the potential for interviews to contribute to re-traumatization of trafficked persons. This precluded the inclusion of their views in this evaluation.

Finally, the evaluation methodology agreed by the evaluator and IOM involved interviews with Tunis-based stakeholders and as such their views may not necessarily be representative of the views of all stakeholders, particularly those based in the Governorates. Overall, the evaluation cannot assume that the perspectives of interviewed stakeholders interviewed represent the perspectives of all project' stakeholders.

In spite of these limitations, the evaluation yielded nine robust findings across the DAC criteria of relevance, effectiveness/impact, efficiency, and sustainability – and one with regard to good practices/lessons learned. The ten findings do not cover each question asked or topic raised during data collection. Instead, the focus was on the issues (1) most frequently cited by respondents and in documents, (2) to which respondents and documents devoted the most time or space discussing, and (3) that were most often identified as salient across respondent types and in project and organizational documents.

Overall, the evaluation found that the Share II project addressed clearly defined needs for 1) strengthening the legal frameworks, particularly the implementation of the Law n. 16-2016; 2) capacity building to identify, investigate and protect victims; 3) awareness raising activities, 4) the provision of multi-sectoral assistance to victims. In particular, the project played a key role in the development and enactment of the new anti-trafficking law, in building capacity to identify VoTs and in strengthening Government ownership and leadership of counter-trafficking efforts in Tunisia.

Through the document review and stakeholders interviews, important shortcomings were identified with regard to the project design. The theory of change did not fully capture the intervention logic in that important elements were either not sufficiently articulated or

included, such as key working assumptions, a risk analysis and mitigation strategy, measurable indicators and a monitoring system. With regard to project implementation and specific results, the strong coordinating role performed by the government resulted in the implementation of activities that were often different from those initially foreseen. Yet, the departure from original project objectives and the re-organization and reallocation of activities did not have negative consequences on the Share II project implementation. Rather, this allowed IOM to divert support to areas of untapped needs, thus enabling the project to advance a comprehensive counter-trafficking response in Tunisia.

The overall project approach – which was characterized by flexibility and rested on the provision of support to the NC to implement their priority activities on a need-basis – was considered by evaluation respondents across all interviewed groups as facilitating achievement of the project’s overall goal of “reinforcing the capacities of the Government of Tunisia, especially the NC, to better counter trafficking in persons and protect the victims in Tunisia, through the implementation of the Law”.

Overall, throughout the evaluation respondents constantly highlighted (1) the impressive progress made in the last few years in the national response to trafficking in persons, (2) the pivotal role played by the National Commission in this progress, and (3) the crucial role played by the Share II project in supporting the NC’s work.

Table 1: Evaluation findings

Findings by DAC Criteria	Data Source
RELEVANCE	
Finding 1: The project was highly relevant and responsive to government priorities.	Document review, interview with IOM staff and other stakeholders
EFFECTIVENESS/IMPACT	
Finding 2: Stakeholders across all respondent groups highlighted the key role played by Share II in the development and enactment of the new anti-trafficking law.	Document review, interview with IOM and other stakeholders
Finding 3: The project design and theory of change did not clearly articulate key risks and assumptions or identify mitigation strategies.	Document review, interviews with IOM and other stakeholders
Finding 4: Stakeholders across all respondent groups highlighted the important contribution made by the project to major increases in the identification of trafficked persons.	Document review, interview with IOM and other stakeholders
Finding 5: The project’s work in the area of direct assistance provides an essential complement to Government services in this area.	Document review, interview with IOM and other stakeholders
Finding 6: The continuous support provided through the Share projects has strongly assisted the Government to establish the foundations for an effective response to counter-trafficking.	Document review, interview with IOM and other stakeholders
Finding 7: The enactment of the new anti-trafficking law has yet to be reflected in prosecutions and convictions for trafficking in persons.	Document review, interview with IOM and other stakeholders
EFFICIENCY	
Finding 8: In partnership with Government, IOM has generated major efficiencies through (1) removing the possibility of	Document review, interview with IOM and

duplication with other agencies, and 2) ensuring that training programs are targeted to the areas of highest priority.	other stakeholders
SUSTAINABILITY	
Finding 9: The project's support to the strengthening of local institutions and, in particular, its respect for the role of the NC as the primary coordinating body has encouraged a strong sense of Government ownership	Document review, interview with IOM and other stakeholders
GOOD PRACTICES/LESSONS LEARNED	
Finding 10: The strong role played by the National Commission in catalysing and coordinating the national response represents a potential model for other countries. Ongoing flexibility of external partners in aligning their activities with government priorities is a crucial prerequisite for this model.	Document review, interview IOM and other stakeholders

Recommendations

The National Commission's role has been crucial to the progress made recently in Tunisia. As the agency recognized by respondents as the NC's closest partner, IOM should continue to support its work. With this in mind, the recommendations focus strongly on IOM's support to the NC. Thus, while the recommendations are for IOM, they also indirectly apply also to the government and the donor.

There are nine recommendations in all. They are not in order of priority. These are:

1. **Support the National Commission to develop annual multi-stakeholder counter-TIP work-plans with clear priorities and realistic targets.**
2. **Support the National Commission to develop a multi-stakeholder system to monitor progress and assess results of activities, particularly with regard to capacity building activities.**
3. **Support the National Commission to develop a multi-faceted strategy to address internal trafficking of children for domestic servitude and forced begging giving primacy to the best interests of the child.**
4. **Facilitate contact between the governments of Tunisia and Côte d'Ivoire with a view to developing and implementing a viable joint approach to combat the pattern of trafficking between the two countries.**
5. **Support the National Commission to develop standards and Standard Operating Procedures for support of trafficked persons, including procedures to collect feedback from service users and feed them back into programming.**
6. **Advocate for the strengthening of the National Commission in line with the expanded counter-trafficking response in Tunisia.**
7. **Support the National Commission to finalize and implement the National Referral Mechanism with particularly attention to addressing the barriers faced by victims of trafficking (1) coming forward and (2) cooperating in the investigation and prosecution of traffickers.**

- 8. IOM should continue to provide direct assistance to victims including through support to local NGOs.**
- 9. IOM should continue to take a flexible approach to project implementation, while more clearly articulating underlying assumptions during the project development phase.**

1. Introduction

1.1 Background and context

Tunisia is a source, destination and transit country for trafficking in persons (TIP). As a source country, IOM and other organizations have collected information on Tunisians seeking economic opportunities who have been trafficked through false promises of well-paid jobs abroad, including to European, Middle Eastern and other African countries. There is also evidence of irregular migration of young Tunisians to Europe. According to data from the Tunisian Forum for Economic and Social Rights (FTDES), around 2,700 undocumented Tunisian irregular migrants reached the Italian shores, in the period from July to September 2017 alone.

Tunisia is also a trafficking destination and transit country. After the 2011 Libyan crisis, hundreds of thousands of migrants and refugees/asylum seekers fled across the southern border of Tunisia. Recently, hundreds of sub-Saharan women, mainly from Côte d'Ivoire, have been identified and assisted as victims of trafficking for domestic servitude in private homes in Tunis, Sfax, Sousse, and Gabes. Between 2012 and February 2019, 85% of victims detected and assisted by IOM Tunisia were from this particular country.

Information collected from the victims and reported by IOM staff suggests that recruitment of Ivorian nationals is primarily done through informal networks of personal contacts. Reported reasons for departure include the prospect of a job in Tunisia and/or the illusion of an easy passage from Tunisia to Europe. Tunisia is also a common destination for these nationals due to the countries sharing the same language (French) and the regime of free-visa access for nationals from Cote d'Ivoire to Tunisia. Among those that have been exploited in Tunisia, some appear to have arrived in Tunisia as students, lost their means to support themselves through school, ended up overstaying their visa and fallen prey to nationals of their own country in Tunisia where they have been exploited in different sectors.

Alongside transnational trafficking, internal trafficking represents a challenge in Tunisia, especially for children in the informal work sector and forced to beg in the streets. Results from the 2017 National Child Labour Survey conducted by the government indicated that 7.9% of all children were engaged in child labour, 63.2% of whom were involved in hazardous work.¹ Children have been found to perform dangerous tasks in agriculture and street work, including vending and garbage scavenging. According to the 2017 Survey, the share of children dropping out of school, which may make them more vulnerable to child labour, remains high. In addition, minimum age protections under the labour law do not apply to children who are engaged in work in the informal sector.²

According to available data and reports from multiple respondents to this evaluation, the exploitation of children for domestic work represents a significant problem in Tunisia, with the situation of girls from Tunisia's northwest regions subject to domestic servitude of particular concern. Traditionally, children of poor families have been sent to work as domestic workers in richer households by their parents. This is a long-standing practice, rooted in traditions, and culturally accepted. Respondents to this evaluation reported that a large section of the population is sympathetic to the reasons why parents may decide to send their children to work as domestic workers, or as beggars, particularly when parents are primarily employed as

¹ Enquête Nationale sur le Travail des Enfants en Tunisie, 2017: Principaux Résultats. December 2017. <http://www.ins.tn/sites/default/files/publication/pdf/Travail%20de%20l%27enfant-v2-6-web.pdf>.

² Government of Tunisia. Code du travail, Loi n° 66–27. Enacted: 1966; Loi n° 65–25 du 1er juillet 1965, relative à la situation des employés de maison, modifiée par la loi n°2005–32 du 4 avril 2005. Enacted: July 1, 1965.

seasonal workers and thus unable to guarantee a sufficient and steady income for their families. It is only in recent years that acceptance of the practice has started to be challenged by awareness raising of the exploitative conditions to which some children are subjected.

In the period from 2017 to 2019, the National Commission for the Fight against Trafficking in Persons (henceforth the NC) provided assistance to 430 victims, of which 31 were children (14 boys and 17 girls). Of the child victims, 68% had been subjected to forced labour and 32% had been sexually exploited.³ The NC is currently also providing assistance to 34 Tunisian victims trafficked to the Gulf States as well as to 363 foreign victims (290 female and 73 men). The principal forms of exploitation recorded by the NC are: domestic servitude, exploitation of forced labour, sexual exploitation, begging and the forced involvement of children with organized criminal networks.

Until 2017, the majority of cases of human trafficking were found in Tunis. Since 2017, an increasing number of victims have been detected at the Tunis airport on their way to Sfax. According to stakeholders, this appears to indicate that trafficking networks are moving or expanding to Sfax, where there is a “market” for labour exploitation in different sectors – industries, agriculture and fisheries, involving both adults and children - and in private homes, particularly domestic child exploitation.

1.2 Project Context

The first Share project (Share I) was implemented from 2011 to 2013 with funding from the US J/TIP. The project was exploratory in nature and aimed to assess the extent, nature, forms and scale of TIP in the country. One of the main results of the project was the “Baseline Study on Trafficking in Persons: assessing the scope and manifestations”, which was the first study in Tunisia on trafficking in persons. The study revealed that “Tunisia was concerned with trafficking in persons as a source, destination, and potentially transit country.”⁴ It also found that Government response to counter-trafficking was weak and overall highlighted a limited understanding and knowledge of the concept of human trafficking among both Government institutions and the general population. Through dissemination of the results, the Baseline Study aimed to “[...] raise awareness, inform and mobilize the necessary resources to prevent and fight trafficking and to better identify and protect victims.” The study included 18 specific recommendations to strengthen Tunisia counter-trafficking responses in the areas of prevention, victim assistance, prosecution of traffickers and national and international coordination.

At the time of implementation of Share I, a draft anti-trafficking law had been pending finalization since 2008 and a referral mechanism for the provision of assistance to victims of trafficking had also been outlined. There were however no clear plans and timeframes for finalization.

At the onset of the Share II phase two project in early 2017, the state of trafficking in persons and Government response in Tunisia was described in the 2016 US TIP report as follows:

The Government of Tunisia does not fully meet the minimum standards for the elimination of trafficking; however, it is making significant efforts to do so.

³ The official French name of the National Commission is l’Instance Nationale de la lutte contre la traite des personnes.

⁴https://tunisia.iom.int/sites/default/files/resources/files/IOMTunisia_BaselineStudyTrafficking_English_LR.pdf

Despite these measures [...] Parliament did not pass draft anti-trafficking legislation, and due to the lack of legal framework, the government did not provide a clear mandate for officials to address human trafficking crimes effectively. The government reported investigating and prosecuting potential trafficking crimes, but without the details of the cases it was unclear how many—if any—traffickers were adequately punished. The government did not fully implement victim identification guidelines or the national victim referral mechanism; therefore, some trafficking victims remained unidentified and vulnerable to punishment for unlawful acts committed as a direct result of being subjected to human trafficking.

Placing Tunisia in the Tier 2 Watch List for the fourth consecutive year, the Report also highlighted that authorities had identified and provided protection services to some trafficking victims in government-operated centres and noted that political, economic, and security challenges in Tunisia prevented the government from dedicating resources and attention to trafficking in persons issues.

This context provided the basis for the planning of activities of the project to “Reinforce capacities to identify and provide adequate assistance to victims of trafficking in Tunisia (Share II phase one).” As for Share I, the Share II project was funded by the US J/TIP. It was launched in 2014 with an initial duration of 36 months and a budget of 700,000 USD. The Share II project’s specific objectives included: (1) support to the enactment of anti-trafficking legislation in Tunisia and to the elaboration of a comprehensive Anti-Trafficking National Action Plan; (2) the strengthening of governmental and non-governmental capacity to counter all forms of trafficking as well as identify and adequately protect victims; (3) the design and implementation of awareness raising activities to sensitize the public, particularly young people, about trafficking in persons; and (4) the provision of direct assistance to victims.

Since the advent of Share II, the Government of Tunisia as well as civil society organizations and the national media have shown an increased commitment to address, prevent and combat trafficking in persons and protect its victims. Law n°2016-61 on the prevention and fight trafficking in persons in Tunisia – articulated around the 4 Ps (prevention, prosecution, protection and partnerships) – was passed unanimously by the Tunisian Parliament in August 2016. In February 2017, the National Commission to Combat Trafficking in Persons (henceforth NC) was established, in accordance with Article 44 of the new Anti-Trafficking Law.

The Share II original end date was set for September 2017. In agreement with the donor, the project duration was extended through a cost-extension, until 30 September 2018, and the title changed to “Reinforce Capacities to Implement the Counter-Trafficking Legislation in Tunisia.” To ensure continuity of activities between Share II and the planned Share III project, which, if confirmed, is due to start in April 2019, the second phase of Share II phase was further extended until 28 February 2019 (no cost-extension). The cost-extension phase of the Share II project has an overall budget of 250,000 USD. The extension phases (cost and no-cost) of the Share II project are the main focus of this evaluation, although the evaluation also makes reference to the previous project phase as well as the first Share project as appropriate.

According to the project document for Share II phase two (cost-extension), the overall goal of the project was to “reinforce the capacities of the Government of Tunisia, especially the National Commission against Trafficking in Persons, to better counter trafficking in persons and protect victims in Tunisia, through the implementation of the Law n. 2016-61.”

The project consisted of four project objectives and eight corresponding activities. These were:

Objective 1): Develop and strengthen the Tunisian anti-trafficking policy framework based on the counter-trafficking (CT) Law n°2016-61;

Activity 1.1) Comprehensive training program addressed to the NC members

Activity 1.2) Technical meetings with the NC to update and set up the TIP strategy and NAP based on the Law

Expected result 1: anti-TIP policy frameworks are updated and implemented.

Objective 2) Enhance the capacities of Tunisian authorities to systematize victim-centered investigations and prosecutions of trafficking cases, based on the new anti-TIP legislation;

Activity 2.1) Training workshops addressed to immigration and law enforcement officers

Expected result 2: the capacities of Tunisian Law enforcement and the Judiciary are enhanced to better investigate and prosecute TIP cases under the TIP Law through a victim-centred approach.

Objective 3) Improve comprehensive services for victims of trafficking (VoTs), delivered by the NC and local associations;

Activity 3.1) Technical meetings with NC and NGOs to develop the national mechanism for the identification, referral and assistance to VoTs

Activity 3.2) Development and launch of the national referral mechanism

Activity 3.3) Training workshops addressed to NC and NGOs on standards related to identification and assistance to VoTs

Expected result 3: the capacities of stakeholders for the identification, referral and assistance of victims are improved.

Objective 4) Enhance the assistance services to VoTs in Tunisia.

Activity 4.1) Direct assistance services to VoTs

Activity 4.2) In-kind support to NC premises

Expected result 4: The VoTs are provided with improved protection and assistance services, respectful of their identity, confidentiality as well as specific needs.

1.3 Objective and scope of the evaluation

In accordance with the IOM and US J/TIP Agreement S-SJTIP-14-GR-1009 the project supported an evaluation to “assess to what extent the project has contributed to its overall objective and achieved its results, and to evaluate if the project’s approach (design and implementation) was the right strategy. The evaluation also sought to generate evidence-based knowledge that could be useful to IOM, the Government of Tunisia and the donor to expand and/or replicate such kind of project. The evaluation was undertaken by Martina Melis, Migration and Research Specialist, Research and Communications Group (RCG) with assistance from Phil Marshall, Director of the Research and Communications Group (RCG).

Following this introduction (Section 1) the remainder of this evaluation report is organized into three further sections. Section 2 describes the evaluation methodology. Section 3 discusses the primary findings of the assessment, organized by the OECD Development Assistance Criteria (DAC) of relevance, efficiency, effectiveness/impact and sustainability. Section 4 provides concluding comments, followed by a set of recommendations to inform future action against TIP in Tunisia.

2. Evaluation Methodology

At the outset of the evaluation, the research team undertook an initial review of project documents to obtain relevant preliminary information about the structure and focus of the project, the implementation of planned activities, and issues identified and addressed during project implementation. Drawing on this initial review and the evaluation TOR, the evaluation team developed an evaluation matrix to guide the evaluation design and data collection and analysis activities (Annex II). The matrix included (1) the primary research questions the study was to address, as aligned with the DAC criteria, (2) adaptations of these questions for use in data collection questions to measure the project's achievements, and (3) the data sources that were consulted to determine responses to the measures.

The data collection process consisted of two components: review and analysis of key project documents; and semi-structured in-person interviews with key stakeholders. Using evaluation research questions, the evaluators developed semi-structured interviews guides for the evaluation.

2.1 Desk Review

The evaluation team reviewed key documents provided by IOM Tunisia. These included: the original project document for Share II "Reinforce capacities to identify and provide adequate assistance to victims of trafficking in Tunisia" and the project document for Share II phase two "Reinforce Capacities to Implement the Counter-Trafficking Legislation in Tunisia"; the project document log-frames; (five) project quarterly reports from September 2017 to December 2018 and annexes to the reports; periodic data reports on "VoTs detected and assisted by the IOM Tunisia (2012 – 2018); reports of the Share II phase two project steering committee meetings.

In the course of the field visits, the evaluator conducting the in-country data collection received and reviewed other documents including: awareness raising material (key rings with cards containing basic information on trafficking; post-cards, and stickers); the "Manual sur la Loi relative à la Prévention et à la Lutte contre la Traite des Personnes en Tunisie"; a copy of the National Strategy to Fight against Trafficking in Persons; a copy of the Law n.2016-61 on the prevention and fight against trafficking in persons; and updated figures on detected, identified and assisted victims of trafficking.

The review of documents served to provide the evaluators with the context and background in which the project was designed and implemented, and of the structure, activities and objectives of the project. This data has been used to assess project's results and validate, contradict or evolve findings emerging from interview data.⁵

⁵ Given the short-time frame for this evaluation, the full review of available documents was completed during and after the fieldwork. Information from these documents and any additional documents provided during the in-country visits were integrated with the data from other sources in this draft final report.

2.2 Stakeholder Interviews

In order to gain insight into the structure, objectives, and results of the project, the evaluator undertook one field trip to Tunis, Tunisia to collect and combine comprehensive information from key project stakeholders. The field visit was conducted from 18 to 22 February 2019 and involved meetings with IOM staff, Government stakeholders in Tunis, including the President of the National Commission to Combat Trafficking in Persons, representatives of civil society organizations and international organizations, a trainer involved in training sessions implemented under the project, and a donor representative in Tunisia. Data was thus collected through desk review of key project documentation and direct interviews with key stakeholders in Tunisia. In the course of the interviews, data collection questions were further tailored to match respondents' particular profile and role in the project.

To assist the evaluator, IOM contracted an independent interpreter who accompanied the evaluator to meetings where interpretation was required. In all cases except one, the interviews were either entirely conducted in English, or with the evaluator posing questions in English and the respondents replying in French. The evaluator has a good understanding of spoken French, and informants generally had enough knowledge of English to understand the questions. The presence of the interpreter was nevertheless invaluable as it allowed clarification of specific issues and validation of reciprocal understanding during the one-to-one interviews.

2.3 Analytic Methods and Approach

Analysis of project documents and stakeholder interviews focused on addressing research questions and determining the extent to which the project's objectives have been met, as well as identifying lessons learned that could inform future counter-trafficking responses in Tunisia. Qualitative document review, quantitative data provided by IOM, the NC and NGOs and interview data were combined to examine the data relationally to determine the frequency and character of the findings, and to assess how they validated and contradicted one another.

Primary themes that were confirmed across data sources served as the study's findings. These findings are presented individually against the relevant DAC criteria, along with the evidence in support of each finding. Data collected in response to the questions on impact overlapped with that on effectiveness. These two criteria have thus been reported on jointly. The evaluators have employed the above findings to develop a set of practical, feasible and targeted recommendations to inform future programming and decision-making.

2.4 Limitations to the Evaluation

The evaluation had some limitations. These included:

- There was limited availability of quantitative baseline and end-line data to assess achievement of all key performance indicators. The limited availability of end-line data was also due to the fact that the evaluation took place prior to the conclusion of the current phase on 28 February 2019. Further, while data exists with regard to number of training events, number of participants, number of meetings, workshops etc., very little information is available on the outcomes of these activities. As a result, the evaluation relies heavily on qualitative data provided by stakeholder feedback.

- Due to the strong role of the government in coordinating the activities of external organizations (discussed further in the findings section), the activities implemented by the project represented often a departure from those initially foreseen. This means that it is not fully appropriate to assess the project based on its original objectives.
- Convenience sampling for interviews preclude generalization of findings to the larger populations from which the samples were drawn. For example, the evaluator cannot assume that the perspectives of the IOM and partner organization staff and beneficiaries that were interviewed represent the perspectives of all IOM and partner organization involved in the project. Further, consulted stakeholders were Tunis-based and thus their views were not necessarily representative of the views of all stakeholders, particularly those based in the Governorates. In this respect, the evaluator cannot assume that the perspectives of stakeholders interviewed represent the perspectives of all project' stakeholders.
- The evaluator did not meet any of the victims of trafficking assisted under the project. This decision was made by the evaluation team taking into account protection and sensitivity concerns, particularly the potential for interviews to contribute to re-traumatization of trafficked persons. This precluded the inclusion of their views in this evaluation.
- Finally, any evaluation that includes self-reported data has the potential challenge of social desirability bias, the tendency for evaluation participants to respond in a way that they believe will be pleasing to others—for example, exaggerating the positive aspects of a project to please project staff.

The evaluation team adopted a number of strategies to minimize the potential effects of these limitations. These included: ensuring that respondents understood that findings would be reported in aggregate, and no comments would be attributed to specific individuals during the reporting process and reviewing qualitative data against available non-project produced quantitative data. In spite of the limitations, the proposed approach yielded multiple robust findings concerning challenges, results, and lessons learned.

3. Evaluation Findings

This section describes the primary findings from the assessment of the Share II project, particularly Share II phase two cost and non-cost extensions as the primary focus of this evaluation. The findings discuss – and are organized by – the relevance, effectiveness/ impact, efficiency, and sustainability of activities and outcomes.⁶ The number of findings and amount of supporting discussion differ by thematic area and finding. This variation reflects the depth and detail of responses provided during data collection and identified in analysis.

The findings do not cover each question asked or topic raised during data collection. Instead, they focus on the issues (1) most frequently cited by respondents and in documents, (2) to which respondents and documents devoted the most time or space discussing, and (3) that were most often identified as salient across respondent types and in project documents. The study findings are sequentially numbered and appear in bold font to indicate their status as a finding. There are a total of ten primary findings.

3.1 Relevance

This section discusses findings related to the extent to which the Share II project addressed clearly defined needs.

Finding 1: The project was highly relevant and responsive to government priorities.

The Share II project began in 2014, at a time when Tunisia had yet to pass anti-trafficking legislation. Evaluation respondents also frequently highlighted that trafficking in persons (TIP) knowledge within the general public and Government institutions - particularly the criminal justice system was limited, leading to a failure to identify victims of trafficking and to provide appropriate care to victims in accordance to their internationally recognized protection rights. The original objectives and activities of the Share projects were thus designed to respond to these needs by supporting responses in different areas in parallel, namely: 1) the strengthening of legal frameworks; 2) capacity building to identify, investigate, prosecute and protect victims; 3) awareness raising activities (a specific objective of Share II phase one only); 4) development of a national referral mechanism (a specific objective of Share II phase two only); and 5) multi-sectoral assistance to victims.

Throughout the implementation of the Share II projects, IOM ensured alignment with key priorities as they evolved, allowing the Share II projects to show considerable responsiveness and flexibility, and to remain relevant. For example, the Share II projects (both Share II phase one and Share II phase two) included activities in areas where other international organizations had also previously provided some support to the Government – namely capacity building for criminal justice actors, where UNODC had been involved, and the development of a National Referral Mechanism, an area of work that the Council of Europe and the Government had started to develop. In both cases, funding to these organizations had not been consistently available, leading to the stalling of activities and plans in these areas.

Through the Share projects and upon request from the Government, IOM was able to step in to advance activities in these areas, particularly training for criminal justice actors, which was supported by IOM in 2017. In this way, the Share projects allowed UNODC and the Council of

⁶ As highlighted in Section 3.2, data collected in response to the questions on impact overlapped with that on effectiveness and findings under these two criteria have thus been reported on together.

Europe some time to secure additional funding while ensuring that activities in areas of Government-identified priorities would continue. In the course of Share II phase two, funding became available again to UNODC and the Council of Europe, which led to a reorganization and reallocation of responsibilities. The newly established NC reviewed different organizations planned activities and allocated responsibilities to each based on their specific sectoral expertise. This meant that responsibility over particular activities, originally planned under the Share II project, was transferred to other organizations. This provided an opportunity for Share II to take on activities focussing on targets groups not originally included in the project (see finding 8).

Overall, the departure from original project objectives and the re-organization and reallocation of activities did not have negative consequences on the Share II project implementation. Rather, this allowed IOM to divert support to areas of untapped needs, thus enabling the project to provide continuously relevant support in line with its overall objective of reinforcing the capacities of the Government of Tunisia to better counter trafficking in persons and protect victims..

3.2 Effectiveness/Impact

This section discusses findings related to effectiveness and impact. As data collected in response to the questions on impact overlapped with that on effectiveness, findings under these two criteria have thus been reported on together.

Finding 2: Stakeholders across all respondent groups highlighted the key role played by Share II in the development and enactment of the new anti-trafficking law.

At the onset of the Share II project in 2014, the US Trafficking in Persons (TIP) Report for 2013 had urged the Government to pass and enact the draft anti-trafficking legislation. Subsequent reports highlighted the absence of a law as hindering law enforcement efforts and contributing to an inability to differentiate trafficking in persons from other crimes. In April 2014, at a joint IOM/Council of Europe/Government of Tunisia workshop on trafficking, the Minister of Justice affirmed the Government's commitment to passing the anti-trafficking law.

When the project Share II was conceptualized in 2014, a key priority was thus to provide technical support to the Government of Tunisia to advance work on anti-trafficking legislation, particularly with regard to the inclusion of clear provisions defining trafficking in persons and the victims of trafficking. Accordingly, the project devoted significant efforts to working with the Government on the draft law as well as to ensuring understanding and ownership of the law by the different ministries and agencies involved.

Multiple evaluation respondents praised the role played by the Share projects steering committee in putting trafficking issues in the political and legislative national agenda, and subsequently in ensuring wide consultation and a participatory approach to the development of the text of the law. This committee – established under Share I and carried into Share II – brought together more than 20 partners including key ministries, specialized national institutions, civil society organizations, and international organizations. Stakeholders considered that the steering committee had provided an important forum for dialogue and exchanges, and through a number of events organized by the project, the opportunity for different ministries and organizations to review and comment on the draft text. In the view of stakeholders, this contributed to building knowledge and understanding of different provisions of the law, as well as ownership of the process and results.

The process culminated in the enactment of the Law n.16 – 2016 on the prevention and fight against trafficking in persons in August 2016. It was notable that among all those interviewed as part of this evaluation, none expressed criticism about the process of drafting of the law, reporting that it had been transparent and participatory.

Finding 3: The project design and theory of change did not clearly articulate key risks and assumptions or identify mitigation strategies.

With regard to project implementation and specific results, as already stated in the section on limitations, the strong coordinating role performed by the government resulted in activities that were often different from those initially foreseen. This means that it is not fully appropriate to assess the project based on its original logic model and theory of change. This finding is, however, included with a view to inform recommendations and future programming.

The project theory of change envisaged that:

“If the national policy framework on TIP (especially the Anti-TIP NAP) based on the CT Law is fully implemented and strengthened; if the law enforcement and justice’s response to TIP through victim-centred investigations and prosecutions of TIP cases is enhanced; if the national mechanism for the identification, referral and assistance to victims is enhanced; then, the national anti-trafficking response, through the role of the NC, in protecting VoTs and prosecuting traffickers will be strengthened”.

A theory of change is intended to map out an initiative through a number of steps, including (1) Identifying long-term goals, (2) identifying basic assumptions about the context, (3) identifying the interventions that will create the desired change, and (4) developing indicators to measure.⁷

While the proposed theory of change and accompanying logic model did identify long-term goals, they did not:

- a)* Articulate basic assumptions. For example, activities under Objective 3 rested on the implicit assumption that the National Referral Mechanism would be finalized at the time of project implementation. This did not happen, and some activities had thus to be cancelled. The project did not include any discussions about this possibility or include any contingency plans. In terms of the context, the proposed theory of change did not identify potential barriers to implementation of provisions in the 2016 law, such as societal norms and cultural traditions.
- b)* Identify the interventions that will create the desired change. The use of the term “enhanced” in the theory of change is not defined, leading the ToC to read as somewhat tautological - that is, if three key pillars of the national response are strengthened, the response itself will be strengthened. Further, the link between outcome indicators, outcomes and desired objectives is not clear. For example, Outcome Indicator 1.2 states that the NRM is updated and approved by the NC. Yet the corresponding Outcome is the updating of the National Action Plan (NAP), and the output is that NC members participate actively. Aside from the clear mismatch between the NRM and NAP, it is not clarify how active participation in itself will lead to updating of the NAP based on the new law;

⁷ <https://www.theoryofchange.org/what-is-theory-of-change/how-does-theory-of-change-work/>

c) Consistently include objectively verifiable indicators nor clear sources and means of verification. This resulted in limited availability of data to assess some envisaged outcomes. For example, Outcome 1 envisages that “NC members demonstrate a better capacity to understand and assume their responsibility, as well as to implement the Law and the NAP. “, with a corresponding indicator stating “% increase in NC members’ level of knowledge on TIP”. However the logical framework 1) did not consistently provide a numerical value to the % increase” (outcome targets were only introduced in the July - September 2018 quarterly report); and 2) did not clearly articulate the meaning of assumption of responsibilities by NC members nor how this would be measured.⁸

Overall, the theory of change did not fully capture the intervention logic in that important elements were either not sufficiently articulated or included, such as key working assumptions, a risk analysis and mitigation strategy, measurable indicators and a monitoring system.

Despite the above, evaluation data suggests that the overall project approach – which was characterized by flexibility and rested on the provision of support to the NC to implement their priority activities on a need-basis – proved to be successful in terms of “reinforcing the capacities of the Government of Tunisia, especially the NC, to better counter trafficking in persons and protect the victims in Tunisia, through the implementation of the Law” as per the project overall goal.

Finding 4: Stakeholders across all respondent groups highlighted the important contribution made by the project to major increases in the identification of trafficked persons.

In the years before the enactment of the law and the establishment of the NC, data from available reports indicated that the government had failed to consistently and proactively identify victims of trafficking. The government did not report identifying any trafficking victims in 2013, despite international organizations having identified victims in the country. In 2014, the Tunisian authorities reportedly investigated 25 potential trafficking cases involving 59 victims; and in 2015, the government identified and assisted three Tunisian trafficking victims exploited abroad and provided assistance to 20 people who had been subject to trafficking in Tunisia, and were identified by an international organization⁹

To address these issues the Government sought assistance from IOM through the Share II project to implement a number of awareness raising activities to sensitize the general public and stakeholders on the nature, characteristics and forms of trafficking in persons. These efforts gained impetus when the new law was enacted and particularly from 2017, the Share II project was able to support numerous sensitization campaigns and activities on the law and its provisions.

Activities co-organized through Share by IOM and the Government included, for example: (1) the National Campaign “#Pas à vendre”, including the organization of a film festival on migration and numerous awareness raising events for the public, the media and academia; (2) the production and airing of five short videos and the distribution of USBs with material produced by the Campaign; (3) the production and distribution of a key-ring with cards synthesizing the key characteristics of human trafficking, key provisions of the law in the area of protection of victims and prosecution of offenders, and the number of two hotlines to seek help and/or report presumed trafficking cases; (4) the production of leaflets in French and

⁸ Project quarterly reports state that written pre and post-test were conducted for some training, while in other cases estimates on increased knowledge was based on verbal conversation with participants

⁹ These data are drawn from the US TIP Report for Tunisia 2014, 2015 and 2016.

Arabic with the text of the law, and; (5) a manual which explains the provisions included in the law (“Manuel sur la Loi relative à la prévention et à la lutte contre la traite des personnes en Tunisie”).

All these initiatives were addressed primarily to the general public and were combined with a general call to actively engage in the detection of victims and to report suspected cases through social media as well as through two dedicated hotlines. The first, operated by the NC, is dedicated specifically to identifying victims of trafficking. For this hotline, IOM supported a training workshop for the hotline respondents as well as a workshop for toll-free operators, which was attended by 40 Child Protection Delegates. The second hotline is operated by IOM and provides information and assistance to vulnerable migrants as well as victims of trafficking.

Since the enactment of the law and the establishment of the NC, there has been a rise in the number of identified VoTs. According to NC data released in February 2019, a total of 780 human trafficking victims were reported in Tunisia in 2018, up from the 742 registered the previous year.¹⁰ According to respondents, a contributing factor has been calls to the hotlines, which have been steadily increasing since the implementation of these awareness-raising campaigns. Publicly available data provided by the NC show that while there were no reports of suspected cases in 2016, there were 18 legitimate calls to the IOM hotline in 2017 and more than 400 to the IOM and NC hotlines, following the establishment of the NC hotline in 2018.¹¹ The increase in the number of victims identified is uniformly attributed by interviewed stakeholders to the combination of (1) efforts focussed on raising awareness on how to detect possible victims of trafficking, (2) training on victim identification and (3) the call for collective engagement by the NC, all of which have been supported by IOM through the Share II project.

Notwithstanding these important achievements, further efforts are needed with regard to addressing internal trafficking, including sensitization initiatives about this particular form of this crime. As discussed in section 1.1, internal trafficking represents a challenge in Tunisia, especially domestic trafficking of children in the informal work sector and forced to beg in the streets, and of girls subject to domestic servitude. Despite recent initiatives that have shed light on the exploitative conditions that some may be subjected to, respondents highlighted that the problem of domestic trafficking remains largely under-stated, under-estimated and un-addressed, and that domestic victims continue to be largely undetected.

Finding 5: The project’s work in the area of direct assistance provides an essential complement to Government services in this area.

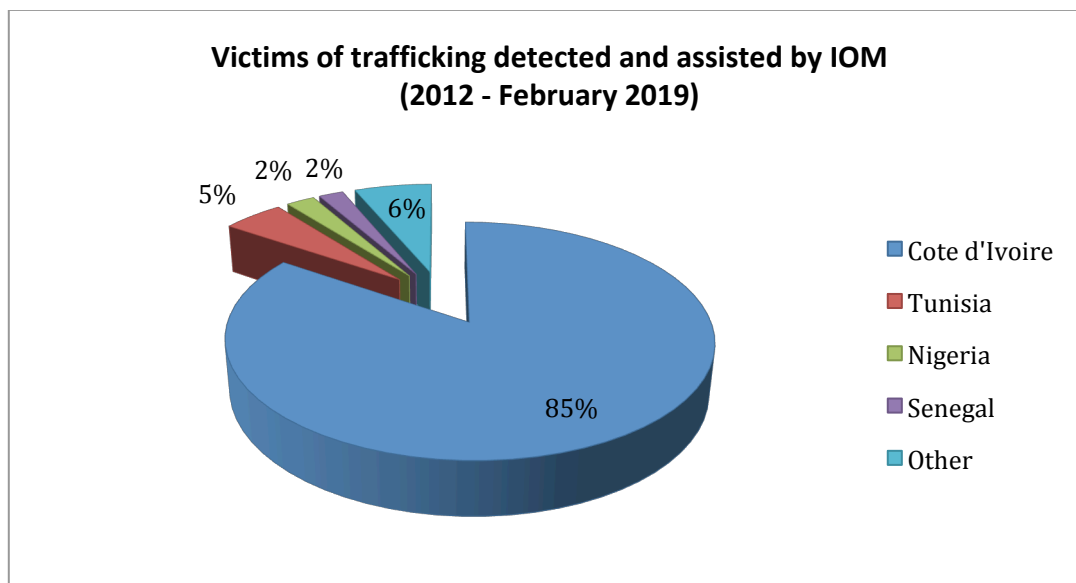
In the period between January 2012 and February 2019, IOM detected and assisted a total of 652 victims of trafficking. This was done in concert with civil society, foreign consulates and, since its establishment, the NC. In the course of implementation of Share II phase two, synergies were also developed with different IOM managed projects that support direct assistance to vulnerable groups (including VoTs), such as the Health Project funded by Finland and the PROTECT project funded by The Netherlands.

Of the total of assisted victims, 512 were women, 129 were men and 11 were children. The majority had been victims of domestic servitude and forced labour in Tunis, Sfax, Sousse, and Gabes. 551 of the assisted victims were nationals of Côte d’Ivoire, 32 were Tunisian nationals,

¹⁰ <https://www.state.gov/documents/organization/243562.pdf>

¹¹ <https://tn24.ween.tn/fr/article/bientot-une-etude-sur-le-suivi-des-proces-et-verdicts-prononces-dans-des-affaires-de-traite-de-personnes-en-tunisie-r-laabidi-85184>

15 were from Nigeria and 13 from Senegal. Other victims assisted by IOM were nationals of Bangladesh, Burkina Faso, Cameroun, Colombia, Congo, Gambia, Ghana, Guinea, Mali, Morocco, the Philippines, Sudan and Chad.



Source: IOM data (2012 – February 2019)

Through the Share II project phases, IOM was able to provide assisted voluntary return and reintegration (AVRR) to 99 victims. Support to VoTs opting to return to their countries of origin is around 1,300 USD. According to one stakeholder, it can take up to three times longer to complete the AVRR procedures for a VoTs than for an irregular migrant. This is because irregular migrants can make an immediate request for AVRR, which is handled by IOM. Detected victims of trafficking, on the other hand, are referred to the NC for formal identification and assistance, which makes for a longer process. Stakeholders have attributed delays to the increased caseload of the NC, which has very limited resources available to handle cases, as well as to the process related to the waiving of penalties that VoTs may otherwise face for overstaying visas.

IOM also provides counselling, psychological assistance, legal assistance, medical assistance as well as transportation, and accommodation through placement in partners' shelters (both Governmental and non-governmental) on request by the NC. At present, IOM cooperates with three NGOs on the provision of shelter to victims of trafficking - VoTs assisted by IOM and the NC are accommodated in three shelters in Tunis operated by three NGOs: Caritas runs two shelters; Amal and Beity have one shelter of each. VoTs assisted by IOM and the NC have also been accommodated at Ministry of Social Affairs shelters in Tunis and in Sfax. In the view of stakeholders, one of IOM's key strengths lies on its ability to offer care, support and protection to victims both in-house and through its network of partners.¹²

Importantly, IOM has been able to support Government action in the area of assistance provision to foreign victims. For example, IOM was able to assist two Tunisian victims of sexual and labour exploitation in Liberia and the UAE. In partnership with the NC and NGOs, IOM has provided shelter, basic needs kits, psychosocial assistance, legal assistance and assisted voluntary return and reintegration in the victims' countries of origin. One stakeholder

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commented that “out of all the victims referred to IOM by the NC, 100% had been provided with assistance by this organization.” As stated in the earlier section on limitations to the evaluation, the evaluation was not able to interview victims of trafficking in care due to protection concerns and feedback from service beneficiaries has not been systematically collected during the project. Thus, their views on services provided in Tunisia are not comprehensively known.

Recently, the National Commission and IOM have been working on a case involving 34 Tunisians (all women), who were victims of trafficking in Saudi Arabia. This represents a new area as thus far efforts have focussed on victims identified within Tunisia. The NC, IOM and other Government Ministries, such as the Ministry of Labour, are currently working together to assist the reintegration of victims in Tunisia. Some respondents viewed this as an opportunity to establish how to implement comprehensive assistance to returning victims of trafficking, that is, to develop procedures and guidelines for victims of trafficking in, or returning to, Tunisia. This is an area where, as noted, Government experience has been limited so far. To date, assistance is largely being provided on a case-by-case basis.

While significant progress has been made since the establishment of the NC in the area of victims’ protection and assistance, this has been primarily with regard to foreign victims, the overall majority from Cote d’Ivoire. In this regard, while the provision of direct assistance has allowed identified victims to receive important care and support, opportunities to address this particular trafficking pattern through wider approaches than the provision of care and the offer of AVRR should be explored. On this matter, one respondent emphasized that dialogue with the Government of Cote d’Ivoire should be a priority with a view to 1) share knowledge on the characteristics of trafficking from Cote d’Ivoire to Tunisia, and to 2) devise joint responses.

Finding 6: The continuous support provided through the Share projects has strongly assisted the Government to establish the foundations for an effective response to counter-trafficking.

The Share projects began at a time when Tunisia’s institutional, legal and counter-trafficking policy frameworks were weak. Evaluation respondents universally credit IOM with playing a key role in supporting the development of solid building blocks of a national response. As well as support for the drafting of legislation (Finding 2), and the provision of services to victims of trafficking referred by the NC (Finding 4), IOM’s has contributed to the work of the National Commission both directly and through supporting activities requested by this agency.

The NC was formally established in February 2017 by Government Decree. The NC is composed of representatives from the Government as well as two civil society organizations working on trafficking in persons, one media expert and one representative from the National Commission on Human Rights. The NC’s role is to coordinate counter-trafficking public policies and ensure the implementation of the anti-TIP NAP in Tunisia, as well as to assist VoTs and contribute to the international cooperation on TIP. The role, mandate and composition of the National Commission are stated in Art. 44 to 49 of the new law.

On January 2018 the NC officially launched its new premises where VoTs are welcomed, identified and referred for protection and assistance in accordance to their needs. The NC is located in Tunis, in a secured and well-served neighbourhood. The NC premises include the office of the President, who is the only full-time staff member, an office for the Secretariat, a room for one social worker in charge of conducting interviews, a space for the hotline operator; one meeting room for the NC members and one training space. It also includes a safe

room with a bathroom and a kitchen aiming to provide victims with immediate assistance once received by the NC. The Share projects provided important support to equip these premises. With respect of the opening ceremony of the NC premises, one stakeholder commented that the fact that IOM was sitting next to the NC President was an indication of the strong relationship between the two organizations.

Other important steps regarding care for VoTs have included (1) the decree that allows for a waiver of penalties for overstaying visas; (2) the work being done around the right to stay for foreign VoTs, including when they do not wish to file charges against their traffickers or return to their countries of origin, which is currently being studied with the Ministry of the Interior in accordance with the provisions of Law No. 61-2016; (3) progress around granting free access to healthcare to all VoTs; and (4) initial discussion on issues around the right to work for foreign VoTs.

According to multiple stakeholders, IOM is a key partner for the Government. It has accompanied the Government throughout the process of designing and developing the national response and has stepped in when other agencies and projects had to discontinue support (see Findings 1 and 7). In particular, stakeholders frequently cited the numerous sensitization initiatives focussing on particular target groups supported by the Share II project as a major contributing factor to these changes. In the words of one, “the Share project was a *force initiateur* – the whole counter-trafficking response dynamic it has fostered is much larger than the individual project activities it has supported.” In the view of multiple stakeholders from different sectors, IOM remains to date the Government strongest partner.

Finding 7: The enactment of the new anti-trafficking law has yet to be reflected in prosecutions and convictions for trafficking in persons.

Expected Result 2.1 for the Share II project envisaged that “The capacities of Tunisian Law enforcement and the Judiciary are enhanced to better investigate and *prosecute* TIP cases under the TIP Law through a victim-centred approach”. However, despite the number of cases being investigated in accordance to the new law (18 cases in 2018; 66 so far this year) there has been no case of prosecution through the new law to date. This was mentioned by multiple stakeholders as a significant challenge to the advancement of counter-trafficking responses in Tunisia.

Stakeholders attributed this to a number of concurrent factors that result in a reluctance to use the new trafficking law in court. In particular, multiple stakeholders highlighted an unwillingness to impose the counter-trafficking prescribed penalties for particular forms of trafficking, specifically those related to exploitation of domestic child labour or child begging, because these are perceived as too harsh against the parents.

Some respondents were understanding of the above reluctance, reporting that judges may consider these crimes within the broader context of traditionally accepted practices and the socio-economic conditions of parents, as well as being concerned with the consequences that lengthy prisons sentences imposed on parents might have on the child and its siblings. These respondents stated that the penalties for these crimes as prescribed in the new law represent too greater change. As noted by one stakeholder, the issue of child domestic workers would previously have fallen under the labour code, which provides for “suspended sentences” for parents. This provision does not exist in the new TIP law.

Some of the same respondents, however, were of the view that a model prosecution is needed as a message that these traditionally accepted practices are no longer tolerated in the country.

This would, of course, need to be weighed against the above concerns with primacy given to the best interests of the child. At the same time, there was widespread agreement that the issues of child begging and child domestic work will not be solved only through the law.

The Government is aware of the complexity of this issue. There are wider policies currently being developed to support poor families that include a number of conditions to access Government assistance such as the requirement for children to be enrolled in school and to be vaccinated. In reducing the vulnerability, there is potential for these policies to impact on domestic child trafficking.

Other issues highlighted by stakeholders with regard to the lack of prosecutions to date included:

1. Limited knowledge of the new law and its provisions within the criminal justice system;
2. The new law is perceived to be 'too perfect' and as such inconsistent with other relevant legal provisions, many of which date back to 1964. In particular, as highlighted above with regard to child domestic trafficking, penalties in the new law - up to fifteen years for trafficking for sexual and/or labour exploitation of children - are much higher than for similar crimes under the penal code, for example:
 - One to three years' imprisonment for forced prostitution of an adult;
 - Three to five years' imprisonment for sex trafficking of a child;
 - One to two years' imprisonment for forced child begging; and
 - Up to 10 years' imprisonment for capturing or detaining a person for forced labour.
3. Available examples pointing to the fact that the crime may be re-qualified for easier sentencing - e.g. rape rather than trafficking for sexual exploitation. While not necessarily bad practice from a law enforcement point of view, this reclassification can affect the ability of victims, particularly foreign victims, to access their rights as trafficked persons.
4. The possible length of the process may discourage victims from engaging, particularly when offered more rapid return home and assistance through AVRR.

A study aiming to identify reasons and barriers preventing the use of the new law to prosecute trafficking cases is currently being undertaken by one NGO in cooperation with the NC. Multiple stakeholders strongly support this initiative, which will shed light into the practicalities of the application the law and barriers to implementation.

3.3 Efficiency

This section discusses findings related to efficiency and the factors that contributed to the efficiency/inefficiency of project implementation.

Finding 8: In partnership with Government, IOM has generated major efficiencies through (1) removing the possibility of duplication with other agencies, and 2) ensuring that training programs are targeted to the areas of highest priority.

In the course of implementation of the Share II projects, donor flexibility allowed IOM to reallocate resources around in order to: 1) reduce the possibility of duplication with other organizations; (2) cover for implementation of activities planned in cooperation with other organizations, which had stalled due to lack of budget; and (3) re-focus efforts on areas/target groups not covered by other projects.

As noted above, after Share II phase two had begun, UNODC secured new funding for Tunisia. A review of planned activities highlighted likely overlap and duplication between UNODC and Share II on capacity building activities for the criminal justice sector.

At the same time, a number of key stakeholder groups identified by the NC as in need of capacity building were not covered by existing programmes. These included: (1) the Ministry of Finance and Customs, for their role in fighting organized networks as well as for their role in waiving penalties for overstaying visas; (2) the Ministry of Vocational Training and Employment, as mandated to respond to the fraudulent recruitment of Tunisian abroad and ability to work on unauthorized placement agencies; (3) the Ministry of Social Affairs, with particular focus on social workers and labour inspectors; and (4) the Ministry of Women, Family and Children, and particularly the Child Protection Delegates to counter child trafficking.

Flexibility in implementation allowed IOM - in coordination with the NC and the Ministry of Finance, to reallocate project resources previously envisaged for capacity building of the criminal justice sector and for the development of the National Referral Mechanism (NRM) to respond to these unmet needs. Thus, the project organized the first-ever training workshop on counter-trafficking for airport customs officers, held by two trainers recommended by the NC with involvement of the head of the Counter-Trafficking Brigade. Following this event, two other trainings were held in Tunis - one training workshop for custom officers from the airports of Tunis, Nefidha, Monastir and Sfax, and one with representatives of border police and the National Guard. The no-cost extension of the project also allowed IOM to organize a training workshop for labour inspectors and to plan for meetings with civil society organizations to discuss their role in the provision of assistance and care to VoTs.

The unmet training needs of the network of Child Protection Delegates were also filled by IOM. The Share project, in fact, was able to support the provision of a comprehensive training to reach a total of 40 delegates by the end of the project. This particular target group was deemed as a priority, as one of the major issues facing Tunisia is the trafficking of children for begging, forced labour and domestic servitude.

This target group had not been originally identified in the project document. As knowledge has increased on trafficking forms and patterns in Tunisia due to increased detection and identifications of victims, it became apparent that Child Protection Delegates have a crucial role to play in the detection, identification and response to domestic child trafficking. Evaluation respondents highlighted that the ability of Share II to reach out to this group represented a very important step forward.

According to the National Commission, "IOM has been our strongest partner. They have always been there for us, and at a time when other organizations had to stall their activities due to funding issues, through the Share II project IOM was there to help us advance our activities and priorities as they emerged".

3.4 Sustainability

This section discusses findings related to sustainability, with a focus on the extent to which key achievements are sustainable beyond the project and the major factors influencing the sustainability or lack thereof of these achievements.

Finding 9: The project’s support to the strengthening of local institutions and, in particular, its respect for the role of the NC as the primary coordinating body has encouraged a strong sense of Government ownership.

The evaluation has highlighted the strong role of the NC in promoting and coordinating the national counter-trafficking response. Given its lack of budget, this has only been possible through the readiness of external and internal agencies to support the NC in this role and align resources with expressed Government priorities. As, according to stakeholders, NC’s closest partner, IOM has played a key role in this process, leading by example in allocating resources to address gaps and priority needs (Findings 1 and 8).

This has allowed the NC, which has no budget for training, to perform strong leadership by identifying needs and directing the assistance available to match those needs.¹³ This in turn has enabled the NC, in cooperation with the Ministry of Interior to build on training received through international projects to design and implement a Training of Trainer (ToT) workshop on counter-trafficking for law enforcement, which has led to the establishment of an initial pool of knowledgeable trainers for use by the Ministry. These trainers are now officially recognized as counter-trafficking trainers and are employed by the Ministry of Interior to perform this role. Additionally, in 2018 a training module on counter-trafficking was included in Police Academies’ curricula and is delivered by trained trainers to widen capacity building reach already at cadet level. The Child Protection Directorate, which originally received training from IOM, also implemented a ToT program, selected five trainers and implemented training workshops in each of the 24 Governorates. These examples highlight that in a favourable context such as that of Tunisia, alignment of assistance with Government’s priorities has not only resulted in strong local ownership, but also facilitated a much more effective and coherent response to training.

With regard to the National Referral Mechanism, one stakeholder revealed that the draft has been ready since last year. However, the NC has decided not to launch it yet as it is currently being piloted with the view of grounding it to the local contexts as well as refining it to make it a mechanism “that would really be used in practice”. In the words of one respondent, the government is prioritizing long-term effective solutions over short-term efforts that may not last: “We have so many examples of failures. We want this to work, so we are taking our time to ensure that it responds to our needs”.

Another area where IOM is working with the NC to ensure the response is more sustainable is victim identification. Since the enactment of the law and the establishment of the NC, there has been a significant increase in number of detection and identification. To date, however, VoTs can only be formally identified by the NC. This has been manageable because of the relatively limited number of cases. In view of the possibly growth, measures are already in place to expand the range of agencies with the formal powers of VoT identification. Agencies able to formally identify VoTs will include: child protection delegates, labour inspectors, customs officers, border and security officers and judges. To complement this, the Government has established “juges de reference” and counter-trafficking focal point teams in different Governorates, which represent another important step in expanding response to the whole country (see finding 10).

¹³ The NC is composed of representatives from different ministries, all of whom have delegated decision-making authority. This allows the NC to take collective decisions faster than if each representative had to seek authorization from its own ministry.

Overall, there is a strong Government commitment to advance counter-trafficking response and the measures to broaden the role of different actors will reduce the current dependence on the NC. Evaluation respondents highlighted that while they are confident that this strong level of government commitment will continue long after Share II, this dependence on the NC remains a caveat. They noted that the NC: 1) is severely under-resourced; and 2) currently relies on the leadership of its President, whose mandate is for five years with no extension, and who does not have a Deputy.

3.5 Good practices/lessons learned

This section discusses good practice and lessons learned that can be drawn from project implementation.

Finding 10: The strong role played by the National Commission in catalysing and coordinating the national response represents a potential model for other countries Ongoing flexibility of external partners in aligning their activities with government priorities is a crucial prerequisite for this model.

Since the enactment of the law and the establishment of the NC, there have been a large number of actions taken by the Government through the NC to implement different provisions of the law. A non-exhaustive list of recent action is:

- Multiple activities to raise awareness about the issue of trafficking in persons, promote the concept of victims protection and inform about the new Law;
- Capacity building activities through training and ToT which have led to the establishment of an initial pool of Government trainers that are being used by different Ministries to train their own staff;
- Immediate responses to newly emerging issues such as the issue of penalties for overstaying visas, which was resolved by the issuance of a Government decree (Decree n.1061-2017) and allows the waiving of penalties for particular categories, including VoTs, and informal agreements with the Ministry of Health to allow free access to medical care for foreign VoTs (although this has not yet been formalized by Decree);
- The establishment of “juges de références” in 17 Governorates to act as references for other judges involved in cases of human trafficking; and the planned establishment of teams of focal points inclusive of representatives of social affairs, security, justice, health, delegates for child protection and NGOs;
- The process of adaptation of Government shelters to accommodate VoTs. The NC has obtained agreement to the allocation of one room in each shelter to be used as needed for VoTs).
- The creation of four working groups mandated to work on the harmonization of legal framework with the trafficking in persons law, in particular the penal code and the labour law.

While stakeholders interviewed for this evaluation frequently commented on the impressive speed of recent progress, another key feature is the strong coordinating role played by the NC. This is manifested in two major ways. First, organizations are being required to adjust planned activities so as not to duplicate or overlap with each other. Second, the NC is insisting that activities supported by external agencies meet national priorities in specific rather than just general terms. For example, while a priority might be support for training of police, the NC is reviewing the details of individual workshops to ensure that the curriculum is in line with what is required in the local context. Similar rigour is being applied to the work of local institutions

with the NC playing a strong role in allocating responsibility to different parts of government and identifying priority actions.

In the experience of the evaluation team, this is a significant departure from national counter-trafficking programs throughout the world. In many cases, the presence of national coordinating bodies and, often also, national plans, does not result in an alignment of external resources with locally expressed priorities and often fails to prevent duplication and overlap. As has been highlighted throughout this report and as has been encapsulated in the Share II project, flexibility on behalf of both donors and the implementing partners is crucial to the success of this approach.

4. Conclusions and Recommendations

This section starts with concluding comments and then discusses primary, crosscutting recommendations arising from the evaluation.

4.1 Concluding comments

The lifetime of the Share II project has seen major changes in the counter-trafficking landscape in Tunisia. A new comprehensive law is in place, a national coordinating body has not just been established but is very effectively leading and coordinating the response, and there has been a major increase in victim identification efforts. Progress on establishing a national referral mechanism is well underway, and more external partners have joined the response, notably UNODC and the Council of Europe.

Throughout the evaluation, stakeholders universally expressed the view that (1) there was strong momentum for counter-trafficking efforts, (2) there was a need to maintain this momentum while becoming a little less urgent and a little more strategic as experience allowed for the development of more systemic approaches and (3) government resources were currently unable to match the speed of the response.

Building on this last point, respondents highlighted the continued need for both technical and financial assistance. Financial assistance affects in particular support for victims of trafficking, where effective identification can place a large burden on government systems and act as a disincentive to future efforts. The need for ongoing external resources has been recognized by the donor, which has unofficially approved a new phase of the Share project, Share III.

The approval by the donor of a further phase is recognition of the contribution that IOM has made to the national response to date. Throughout the evaluation respondents have constantly highlighted (1) the progress made in the last few years, (2) the pivotal role played by the National Commission in this progress, and (3) the crucial role played by the Share II project in supporting the NC's work.

It is important to highlight that these conclusions are based strongly on stakeholder feedback, particularly with regard to attribution of changes in the response. Very little data was collected by the project on the outcomes of specific activities, for example application of skills learned in training workshops and changes in knowledge arising from awareness campaigns. These are areas that could be strengthened in the next phase.

Overall, available information thus suggests that the Share II Project has made a strong contribution to the Tunisia's response to trafficking in the recent years and can take its share of the credit for the fact that the core foundations for an effective response are now in place. In doing so, there has been a significant departure from the original project design and objectives, as IOM sought to better align its assistance with emerging priorities and withdraw from areas as new agencies became involved. It is a strong credit to the donor that IOM has been given the scope to do so.

4.2 Recommendations

During the evaluation, participants expressed their views on key priorities for Tunisia's response to human trafficking. These priorities are not necessarily IOM or project-specific but have been reproduced here to provide overall context. The evaluation team has drawn on

these suggested priorities and the findings in the previous Section to distil a set of nine recommendations for IOM and the donor.

Key priorities for Tunisia as identified by evaluation respondents

Key priorities areas for future action identified by respondents include:

Communications and knowledge

- More initiatives aimed at the general public on human trafficking, including on internal trafficking and on the rights and vulnerabilities of victims of trafficking;
- Knowledge building (particularly for criminal justice actors) of the new law and its provisions for the prosecution of offenders and the protection of victims; and
- Knowledge building (for service providers) and awareness raising (for the public) on the national referral mechanism, once in place.

Capacity

- Formal and informal training (e.g. mentoring) for criminal justice actors, building on existing training mechanism and plans, and utilizing the existing Government teams of trainers;
- Training for front-line law enforcement officials on victim detection to support the work of the small specialist unit, the Counter-Trafficking Brigade, which has been trained in counter-trafficking;
- Training and supporting activities in the Governorates, tailored to the local context and needs of local actors, in particular labour inspectors, which is a priority target group identified by the NC;
- Study visits for the National Commission members to study how similar coordinating mechanisms operate in other countries as well as effective National Referral Mechanisms operation; and
- Multi-departmental training across Government Institutions, also with the inclusion of NGOs.

Protection and assistance frameworks

- Develop SOPs for victim support services.
- Launch the NRM and an accompanying database, particularly to allow for follow up on VoTs across the care continuum. The NRM needs to also address the emerging scenario in which VoTs are refusing to file charges and do not wish to return home.
- Continue to work towards the institutionalization of provision of free access to health services for all victims – both national and foreign.
- Training on NRM and SoPs to institutionalize the provision of assistance, to date undertaken very much on a case-by-case basis. Training should be specifically tailored to the needs, role and types of stakeholders involved, including NGOs.
- Funding for direct assistance, including victim follow-up. Currently this mainly consists of AVR through IOM. The NC in particular has asked IOM to provide support to selected NGOs for the provision of specific assistance to VoTs, particularly with regard to accommodation.

Legal and policy framework

- Study on different types of trafficking to update baseline report of 2013, with particular focus on internal trafficking which as highlighted under Finding XX, appears to be a significant but under-reported problem in Tunisia;
- Address the issue of Tunisian nationals recruited through private employment agencies to work in exploitative conditions abroad, including a review of current labour laws and rules and procedures that regulate contracts, and licensing of recruitment agencies with the view of identifying gaps and loopholes; and
- Develop a strategy to address internal trafficking, particularly with respect to child trafficking for begging and domestic work. This needs to take into account the role of social norms and cultural traditions and prioritize the best interests of the child.

Partnerships and coordination

- Strengthened resources for the NC to perform its leadership and coordination role in keeping with the expanded response; and
- Facilitation of cooperation between the Governments of Tunisia and Côte d'Ivoire to address human trafficking between the two countries.

4.3 Evaluation recommendations

This section outlines the recommendations arising from the evaluation. The National Commission's role has been crucial to the progress made recently in Tunisia. As the agency recognized by respondents as the NC's closest partner, IOM should continue to support its work. With this in mind, the recommendations focus strongly on IOM's support to the National Commission. Thus, while the recommendations are for IOM, they also indirectly apply also to the government and the donor.

There are nine recommendations in all. They are not in order of priority.

1. Support the NC to develop annual multi-stakeholder counter-TIP workplans with clear priorities and realistic targets.

This is preferred over a National Plan, which can be resource intensive to develop, often become quickly out-dated and have frequently been shown as an ineffective mechanism for prioritization and coordination.¹⁴ It does not preclude the development and implementation of longer-term strategies involving selected stakeholder and on specific issues (see Recommendations 3 and 4). As part of this work, key external agencies could be asked to identify the specific areas of work in which they can make the best contribution, to reduce the possibility of future overlap.

2. Support the National Commission to develop a multi-stakeholder system to monitor progress and assess results of activities, particularly with regard to capacity building activities.

At present, most reporting from both the project and the National Commission is output-based, which hinders the assessment of the outcomes of specific activities and their

¹⁴ See UN Inter-Agency Coordination Group Against Trafficking in Persons (ICAT), "Pivoting toward the Evidence: Building effective counter-trafficking responses using accumulated knowledge and a shared approach to monitoring, evaluation and learning", available at: http://icat.network/sites/default/files/publications/documents/16-10259_Ebook.pdf

contribution to the national response. Much work has been done on the development of indicators and monitoring systems that could be drawn on to build a shared monitoring and evaluation framework for counter-trafficking activities.¹⁵ The use of common indicators and processes would also facilitate the aggregation of data across organizations and years.

3. Support the National Commission to develop a multi-faceted strategy to address internal trafficking of children for domestic servitude and forced begging giving primacy to the best interests of the child.

A common theme throughout the evaluation was the limitations of a narrow law enforcement approach to child trafficking. Far from the new law creating a deterrent to the crime, there are concerns that the much stronger penalties in the new law might be discouraging its use and thus having potentially the opposite effect. One suggestion, for example, was to find a case that could be used as a model for deterrence, which could potentially involve a long prison sentence for parents. However, prison sentences for parents, even those complicit in trafficking, present potentially serious child rights implications, not just for the trafficked children, but also for their siblings.

Further, stakeholders repeatedly highlighted the need to address long-standing cultural norms as part of this response. With this in mind, there would be strong advantages in developing a multi-faceted strategy to address this issue, drawing on the principles of crime prevention models which combine vulnerability reduction, with reducing opportunities for traffickers with effective law enforcement and work on social norms to ensure the crime is seen as socially unacceptable.

4. Facilitate contact between the governments of Tunisia and Côte d'Ivoire with a view to developing and implementing a viable joint approach to combat the pattern of trafficking between the two countries.

The large majority of foreign trafficking victims identified in Tunisia come from Côte d'Ivoire. Cooperation is needed between the two countries to develop a joint approach to address this issue. As with the previous recommendation, this approach should combine different types of interventions, including the sharing of data and operational intelligence. For example, information from victims in Tunisia as to the circumstances of their trafficking could inform not just law enforcement efforts but also awareness raising and other vulnerability reduction approaches in Côte d'Ivoire. Joint training and joint investigations may be considered as well as joint operations, for example at recruitment and transport hubs.

5. Support the National Commission to develop standards and Standard Operating Procedures for support of trafficked persons, including procedures to collect feedback from service users and feed them back into programming.

The country does not yet have clear standards for victim support or ways of monitoring the adherence of victim support agencies to these standards. IOM has a wealth of experience globally to contribute in this area. Although some stakeholders see this as part of National Referral Mechanism development (see next recommendation), this work is not dependent on NRM finalization and could commence beforehand.

¹⁵ One example is the [ICAT Toolkit for designing and evaluating counter-trafficking programmes](http://icat.network/sites/default/files/publications/documents/16-10273_ICAT_toolkit.pdf). Discussions are underway between IOM and UNODC at headquarter level on how to increase the use of this toolkit, available at: http://icat.network/sites/default/files/publications/documents/16-10273_ICAT_toolkit.pdf

As part of this work, service providers (Government, NGOs and IOM) are encouraged to consider the systematic collection of feedback from service beneficiaries to regularly assess the appropriateness, range and quality of service provided, identify gaps in provision and ensure that this information is fed back into programming.

6. Advocate for the strengthening of the National Commission in line with the expanded counter-trafficking response in Tunisia

The National Commission has catalysed major progress in Tunisia in spite of very limited resources. Further, it is significantly expanding the resources effectively available to the country by (1) reducing overlap and duplication and (2) deterring support for non-priority or mis-targeted activities. While external support is likely to be needed for many activities in the foreseeable future, the government should be in a position to increase the staffing allocation of the NC, which currently comprises of a single full-time person.

7. Support the National Commission to finalize and implement the National Referral Mechanism with particularly attention to addressing the barriers faced by victims of trafficking (1) coming forward and (2) cooperating in the investigation and prosecution of traffickers.

Evaluation respondents supported the approach of the government in not rushing to finalize the NRM. This will allow the NRM to address emerging issues such as foreign victims of trafficking refusing to file charges and not wishing to return home. While thus far all identified foreign victims have reportedly chosen voluntary return to their countries of origin, alternatives need to be identified. At present, the law provides for a reflection period of one month, extendable for another month. There is, however, no clear option for foreign victims of trafficking who do not chose to file charges to remain in Tunisia beyond this period. This can act as a strong deterrent to victims being officially identified. This is an important consideration with regard to discussions on the victim's right to remain in the country, even where they do not wish to cooperate with criminal justice authorities.

8. IOM should continue to provide direct assistance to victims including through support to local NGOs.

A lot of initiatives and resources thus far have been targeted at strengthening Government responses and institutions. With the continuous growth in identified victims in need of care and in view of the implementation of the NRM, the Government will need to expand its network of care providers able to provide assistance. NGOs can play a crucial role in detecting victims of trafficking, providing them with legal, psychosocial, accommodation and other assistance, supporting them through the criminal justice process as well as through reintegration. Due to their direct social support services and direct contact with trafficked persons, NGOs are often well placed to win the confidence of their clients, which may lead to increased willingness to testify and the likelihood of being better witnesses in court. It is thus important that resources are devoted to building their capacity and formalizing their roles to enable them to become capable and recognized partners in the protection of victims of trafficking.

9. IOM should continue to take a flexible approach to project implementation, while more clearly articulating underlying assumptions during the project development phase.

As highlighted throughout this document, the flexible approach taken by IOM with the support of the donor has been instrumental in providing effective and efficient assistance to the

government in line with national priorities. It is strongly recommended that this continue. At the same time, the original project design could have more clearly articulated the key working assumptions, identified possible areas of weaknesses, and flagged mitigation strategies, as well as detailing clear means of verification for the chosen indicators. This would potentially have helped maintain a closer relationship between the design and implementation, while maintaining implementation flexibility.

ANNEXES

Annex 1 - Evaluation Terms of Reference

TERMS OF REFERENCE

Final evaluation of “Reinforce capacities to identify and provide adequate care to victims of trafficking in Tunisia (Share II)” -project

Commissioned by IOM Tunisia

CONTEXT

Established in 1951, the International Organization for Migration (IOM) is the UN Migration Agency. IOM is dedicated to promoting awareness and understanding of migration governance framework through trainings, research and technical assistance to the member of states and other stakeholders. An integral part is the provision of assistance to governments in developing national laws and policies to enhance the effective management of migration in conformity with regional and international migration governance frameworks.

Through two J/TIP funded projects: “SHARE I” (2011-2013) and “SHARE II” (2014-ongoing) as well as other projects implemented in synergy with these, IOM Tunisia has contributed to the efforts of the Government of Tunisia, especially the National Commission against Trafficking in Persons (NC) under the Ministry of Justice to put trafficking issues in the national political and legislative agenda, to prevent trafficking in persons and to protect the victims. Recent milestones reached by Tunisia, under the leadership of the NC, include the enactment of the anti-TIP Law n°2016-61, the development of the anti-TIP National Action Plan, and the setting up of the NC in February 2017.

Currently, IOM Tunisia is finalizing the implementation of the phase II of the project “Reinforce capacities to identify and provide adequate care to victims of trafficking in Tunisia -Share II”. The duration of the project is January 1st 2017-February 28th 2019. The project has a budget of USD 750 000 and it is funded by funded by JTIP. Within the framework of the mentioned phase II of the project, IOM is expected to conduct a final external evaluation. IOM is seeking to hire a consultant to carry out the evaluation of the phase II of the Project. The consultant will work under the overall guidance of the IOM Tunisia Chief of Mission and the direct supervision of the IOM Tunisia Head of Migration Counter Trafficking / Migrant Protection and Assistance Unit.

The overall goal of the project is to reinforce the capacities of the Government of Tunisia (GoT), especially the National Commission against Trafficking in Persons (NC), to better counter trafficking in persons (TIP) and protect victims in Tunisia through the implementation of the Anti-TIP Law n°2016-61. Specifically, the project objectives are: 1) Develop and strengthen the Tunisian anti-trafficking policy framework based on the counter-trafficking (CT) Law n°2016-61; 2) Enhance the capacities of Tunisian authorities to systematize victim-centered investigations and prosecutions of trafficking cases, based on the new anti-TIP legislation; 3) Improve comprehensive services for victims of trafficking (VoTs), delivered by the NC and local associations; and 4) Enhance the assistance services to VoTs in Tunisia. The objectives are expected to be achieved through a set of complementary activities organized around four expected results: 1/ Anti-TIP policy frameworks are updated; 2/ The capacities of Tunisian Law enforcement and the Judiciary are enhanced to better investigate and prosecute TIP cases under the TIP Law through a victim-centered approach; 3/ The capacities of stakeholders for the identification, referral and assistance of victims are improved; 4/ The VoTs are provided with improved protection and assistance services, respectful of their identity, confidentiality as well as specific needs.

PURPOSE

The overall objective of this final evaluation of the project is to assess to what extent the project has contributed to its overall objective and achieved its results, and to evaluate if the project's approach (design and implementation) was the right strategy. The evaluation of the phase II will present a learning opportunity for IOM Tunisia in view of the implementation of the expected phase III of the project, and the planning of other similar projects. The evaluation will play a critical part in assessing to what extent objectives of the current project have been achieved. The evaluation is expected to assist with the operational planning, implementation and monitoring of the next phase of the project, which is expected to start in March 2018.

The key objective of this final evaluation is to:

- Assess to what extent the project has contributed to its overall objective and achieved its results, and to evaluate if the project's approach (design and implementation) was the right strategy.

Specific objectives include to:

- Evaluate the relevance and validity of the choice of strategies and activities for achieving the project objective,

- Evaluate the project's effectiveness in contributing towards its objective and project purposes including assessing level of quality the project has achieved,
- Analyze the efficiency in contributing towards the project objective, measuring how economically resources/inputs (funds, expertise, time) are converted into results,
- Analyze the project outcome and impact looking at primary and secondary long-term effects produced by the project intervention, directly or indirectly, intended or unintended,
- Analyze the sustainability of the project by looking at the lesson learned and best practices.

EVALUATION SCOPE

The evaluation is expected to cover the entire duration of the phase II of the project, including the initial 36 months, starting in January 2017 as well as extension periods until February 2019 approved by the donor. The evaluation will include a field visit to Tunis, Tunisia, with the remainder of the evaluation to be conducted as a home-based assignment.

CRITERIA

OECD DAC principles for Evaluation of Development Assistance.

QUESTIONS

The below questions are indicative of the key questions to be addressed in the evaluation under each evaluation criterion:

Relevance

- Are the project activities relevant to project objectives and expected results?
- Did the project target the right beneficiaries?
- Is the strategy of the project relevant to the needs of its target population and institutional beneficiaries?
- Have the projects' assumptions been accurate?
- Is the design of the budget of the project relevant to answering the needs identified and implement all activities?
- Are the objectives relevant to the needs of the project's key target groups?

Effectiveness

- To what extent were project activities translated into expected short- and long-term results (outputs and outcomes)
- Are the project and its specific objectives effective in supporting efforts to protect and assist vulnerable migrants?
 - To what extent did the project achieve its outcomes?
 - In cases of adaptations to original design of the project, did these have repercussions on its expected outcomes of the project?
 - What observed changes in attitudes, capacities and institutions can be causally linked to the project's interventions?
 - What do the beneficiaries and other stakeholders perceive to be the outcomes of the project?
 - Did the project lead to additional results? If so, which results?
 - Can any unintended or unexpected positive or negative effects be observed as a consequence of the projects' interventions?
 - How effective was the project in reaching target populations and institutional beneficiaries, and in implementing activities in order to reach objectives?
 - What are the main obstacles or barriers that the project has encountered during implementation?
 - Has the project been successful in addressing these obstacles and how? How did they affect the overall effectiveness of the project?
 - How effectively were the project results monitored?

Efficiency

- Would other activities have been more cost-effective for reaching the projects' objectives?
- How well have resources been managed to achieve the results in the context in which it operates?
- What external socio-economic and political factors, if any, affected the implementation of the project?
- How effective were adaptations to project made to accommodate changes during implementation due to socio-economic and political factors?

Sustainability

- What project activities and benefits are likely to continue if funding ceased?
- To what extent are the projects' results likely to be sustained in the long-term?
- Is the project supported by local institutions and well-integrated with social and political conditions in Tunisia?

- Can the project's results be replicated or scaled up by IOM or national partners?
- What should have been done in order to better guarantee sustainability, if applicable?
- How successful has the project been in leveraging non-project resources for guaranteeing sustainability of project results, including but not limited to other IOM Tunisia projects?
- To what extent have cross-cutting issues such as gender and human rights been taken into account in project design and implementation?

The evaluation may identify additional questions during the process to better respond to the evaluation purpose. The evaluation should identify the most important results, lessons learned, or best practices to be considered while continuing to implement this project into its follow-up phase, and what should be avoided in order to improve implementation (a recommendations/next steps section).

METHODOLOGY

A mixed method approach will be used with qualitative and quantitative evaluation techniques. In particular, these will be comprised of:

- A documentation review: IOM Tunisia will be responsible for providing the necessary documentation, including activity and project reports, M&E tools, financial data, correspondence, specific agreements and/or sub-agreements, technical documentation reports, together with any other documentation that IOM Tunisia considers important for the evaluation exercise,
- A series of interviews with beneficiaries and implementing partners, IOM Tunisia Chief of Mission, project coordinator and other key staff in the implementation of the project, and other persons that IOM Tunisia or the evaluator deem necessary.

DELIVERABLES

The outputs of the evaluation will be:

- An inception report that outlines clearly the evaluation approach and tools to be used. The inception report must also include an evaluation matrix which includes the methodology to be used, indicators, evaluation questions, and detailed work plan.
- A maximum of 30-page long draft report in English without annexes (including an executive summary and outlining the methodology pursued, indicators, data sources and findings of the evaluation, good practices, lessons learnt, missed opportunities,

strengths and failures, gaps and challenges on the design, management and implementation of the project). The draft of the report will be presented to IOM for comments and inputs, after which the evaluator will finalize the report and submit the final evaluation report to IOM.

- A final evaluation report that reflects comments/feedback from IOM.
- A two-page evaluation brief.

The consultant is required to submit draft documents in English to IOM for comments.

WORKPLAN

The provisional timetable for the evaluation consultant is as follows:

- Submission of Evaluation Proposal by Monday 4 February 2019
- Desk Review: Reviewing documents, desk research, further development of methodology and evaluation matrix, and production of inception report by 18th February 2019
 - Field Visit (minimum of 5 working days in Tunisia) 2019 to meet with project coordinator, manager, implementers, stakeholders and beneficiaries, and debriefing by 25 February.
 - Report Production / Drafting and submission to IOM for feedback by 28 February.
 - Finalizing of the report

The evaluation proposal must include a financial proposal. Disbursement of the funds will be effected upon satisfactory submission of the set deliverables.

Annex II - Evaluation Matrix

Proposed Evaluation Question	Data Collection Questions	Data Sources
Relevance <i>(The extent to which the objectives of a development intervention are consistent with beneficiaries' requirements, country needs, global priorities and partner' and donor's policies)</i>		
1. To what extent did the project "Reinforce capacities to identify and provide adequate care to victims of trafficking in Tunisia (Share II), phase two" address a clearly defined need?	<ul style="list-style-type: none"> • Were there specific problems you felt the project Share II (and specifically its second phase), was designed to address? And in relation to: <ol style="list-style-type: none"> 1) the Tunisian anti-trafficking policy framework based on the counter-trafficking (CT) Law n°2016-61; 2) the capacities of Tunisian authorities to systematize victim-centered investigations and prosecutions of trafficking cases, based on the new anti-TIP legislation; 3) the provision of comprehensive services for victims of trafficking (VoTs), delivered by the NC and local associations? 4) the provision of direct assistance of VoTs? • How did you ensure that the project strategy would be consistent with, and supportive of the needs of target beneficiaries (target population and institutional beneficiaries)? • How did you ensure that the project would be consistent with, and supportive of Government priorities? 	Document review IOM Staff Government/(Partners) Donor
Effectiveness <i>(The extent to which the development intervention's objectives were achieved, or are expected to be achieved, taking into account their relative importance.)</i>		
2. How did the project design and the project stakeholders conceptualize the link between planned activities (including target groups and locations) and desired outcomes?	<ul style="list-style-type: none"> • What were the primary activities implemented as part of the project? • Were there any activities planned, but not implemented? <ul style="list-style-type: none"> ○ If so, what were they? ○ Why were they not implemented? 	Document review IOM Staff (Government/Partners) Donor

	<ul style="list-style-type: none"> • How coherent and realistic do you consider the project strategy and intervention logic? <ul style="list-style-type: none"> ○ (How do you understand the link between the project’s activities and the desired objectives?) ○ To what extent activities implemented were complementary within themselves, with other IOM operations and with interventions of other actors? ○ To what extent do you consider the project documents identify the outcomes and impacts expected from the project? ○ To what extent do you consider the project’s timeframe sufficient to reach its objective and outcomes in the context in which it operates? 	
<p>3. How do key stakeholders understand the extent to which projects objectives have been achieved / are likely to be achieved?</p>	<ul style="list-style-type: none"> • To what extent do you consider project objectives have been met under: <ol style="list-style-type: none"> 1) Anti-TIP policy frameworks are updated; 2) The capacities of Tunisian Law enforcement and the Judiciary are enhanced to better investigate and prosecute TIP cases under the TIP Law through a victim-centered approach; 3) The capacities of stakeholders for the identification, referral and assistance of victims are improved; 4) The VoTs are provided with improved protection and assistance services, respectful of their identity, confidentiality as well as specific needs. 	<p>Document review IOM Staff Government/Partners Donor</p>
<p>4. What are the main obstacles or barriers that the project has encountered during the implementation of the project?</p>	<ul style="list-style-type: none"> • Did you experience any barriers or challenges to implementation of project activities? <ul style="list-style-type: none"> ○ If so, which challenges/barriers and on which activities? ○ How did they affect the outcome of the activities? • Were you able to overcome them? If so, how? 	
<p>Efficiency <i>(A measure of how economically resources/ inputs (funds, expertise, time, etc.) are converted to results.)</i></p>		
<p>5. What internal/external factors contributed to the efficiency /inefficiency of project implementation?</p>	<ul style="list-style-type: none"> • To what extent were activities implemented as scheduled? • If there were delays, how were they addressed? 	<p>Document review IOM Staff</p>

	<ul style="list-style-type: none"> • To what extent do you consider these delays affected the quality of activities delivered? • How were resources allocated and monitored to encourage cost-effective implementation? • What factors, in your view, contributed to the efficiency or inefficiency of project implementation? • What, if any, alternative strategies could have achieved similar results in a more cost effective manner? 	(Government)/Partners Donor
Impact <i>(The positive and negative, primary and secondary long-term effects produced by a development intervention, directly or indirectly, intended or unintended.)</i>		
6. What do those who participated in the project activities regard as their primary achievements?	<ul style="list-style-type: none"> • What, in your opinion, have been the main achievements of the project? • In your view, what type of observed changes did the project contribute to with regard to: <ul style="list-style-type: none"> – knowledge – attitude – capacity (personal/institutional) (To what extent were local capacities developed or strengthened through the project?) • What difference has the project made to the project beneficiaries? 	Document review IOM Staff Government Partners Donor
7. Can any unintended or unexpected positive or negative effects be observed as a consequence of the project's interventions?	<ul style="list-style-type: none"> • What if any unintended or unexpected effects occurred as a consequence of the project's interventions? • Were these effects positive or negative? 	
Sustainability <i>(The continuation of benefits from a development intervention after major development assistance has been completed. The probability of continued long-term benefits.</i>		
8. To what extent are the key outcomes achieved sustainable beyond the project?	<ul style="list-style-type: none"> • Of the identified achievements, are there any plans in place to ensure that they continue beyond this project? • In the view of stakeholders, what additional measures could have been taken to promote sustainability? 	Document review IOM Staff Government/Partners Donor

<p>9. What are the major factors influencing the sustainability or non-sustainability of project's achievements?</p>	<ul style="list-style-type: none"> • To what extent are project's activities supported by local institutions? • To what extent are government institutions sufficiently resourced and trained to respond to trafficking in persons in the country (including through the implementation of the Law n. 2016-61)? • How successful has the project been in leveraging non-project resources for guaranteeing sustainability of project results, including but not limited to other IOM Tunisia projects? • Are the mechanisms in place to ensure future coordination with other relevant counter-trafficking initiatives to build synergies and avoid duplication? 	
<p>Good practices and lessons learned</p>		
<p>10. How did this phase of project link with, and build on, the previous project phases?</p>	<ul style="list-style-type: none"> • Has the project been able to draw on learning and achievements from the previous project phases? 	<p>Document review IOM Staff Government/Partners Donor</p>
<p>11. What good practice and lessons learned can be drawn from implementation?</p>	<ul style="list-style-type: none"> • In your view, which objectives could be built-on further? • Which, if any, aspects should be avoided to improve implementation? • In your view, which (if any) results, lessons learned, or good practices should be considered for the next phase of the project? 	